

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHICKEN SOUP FOR THE SOUL
ENTERTAINMENT INC, *et al.*,¹

Debtors.

Chapter 7

Case No. 24-11442 (MFW)
(Jointly Administered)

Related Doc. No. 578

**CHAPTER 7 TRUSTEE'S LIMITED OBJECTION TO THE MOTION OF
A MIGHTY HAND, LLC FOR RELIEF FROM THE
AUTOMATIC STAY AND RELATED RELIEF**

George L. Miller in his capacity as Chapter 7 Trustee (the "Trustee") for the Estates of the above-captioned Debtors (the "Debtors"), by and through his undersigned counsel, files this limited objection (the "Limited Objection") to the *Motion of A Mighty Hand, LLC for Relief from the Automatic Stay and Related Relief* [D.I. 578] (the "Motion") as follows:

1. The Trustee objects to the Motion by A Mighty Hand, LLC (the "Movant") and the proposed order for relief submitted by the Movant, a copy of which is attached hereto as Exhibit "A" (the "Movant's Proposed Order") to the extent the Movant's Proposed Order seeks declarations of rights in property and authorizations to terminate which exceed a mere grant of relief from the automatic stay of 11 U.S.C. §362 to pursue its remedies as permitted under applicable law regarding the License Agreement² and the relief sought by the Movant in the

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number (where applicable), are: 757 Film Acquisition LLC (4300); Chicken Soup for the Soul Entertainment, Inc. (0811); Chicken Soup for the Soul Studios, LLC (9993); Chicken Soup for the Soul Television Group, LLC; Crackle Plus, LLC (9379); CSS AVOD Inc. (4038); CSSESIG, LLC (7150); Digital Media Enterprises LLC; Halcyon Studios, LLC (3312); Halcyon Television, LLC (9873); Landmark Studio Group LLC (3671); Locomotive Global, Inc. (2094); Pivotshare, Inc. (2165); RB Second Merger Sub LLC (0754); Redbox Automated Retail, LLC (0436); Redbox Entertainment, LLC (7085); Redbox Holdings, LLC (7338); Redbox Incentives LLC (1123); Redwood Intermediate, LLC (2733); Screen Media Films, LLC; Screen Media Ventures, LLC (2466); and TOFG LLC (0508). The Debtors' corporate headquarters and service address is 132 East Putnam Avenue, Floor 2W, Cos Cob, CT 06807.

² Capitalized terms unless expressly defined herein shall have the meanings ascribed to them in the Motion.

Motion can only be properly obtained by the Movant initiating an adversary proceeding as required under Federal Rule of Bankruptcy Procedure 7001.

2. The Trustee further objects to the Motion and the Movant's Proposed Order on the basis that the License Agreement in Section 18 expressly prohibits termination in the event of breach and instead provides *inter alia* as follows:

In the event of a breach by either party hereunder excluding timely delivery of the Picture, the other party's sole remedy shall be an action at law for money damages and **in no event shall either party be entitled to** an injunction, rescission, **termination**, or any equitable relief.
(emphasis added)

Accordingly, Movant has no basis for the bankruptcy court to enter Movant's Proposed Order which provides for a determination of termination of the License Agreement by virtue of breach.

3. The Trustee does not object to the entry of a revised Proposed Order in the form attached hereto as Exhibit "B" (the "Trustee's Revised Proposed Order") which is limited to granting the Movant's relief from the automatic stay of 11 U.S.C. §362 to pursue its remedies as permitted under applicable law regarding the License Agreement.

WHEREFORE, the Trustee respectfully requests based upon the foregoing Limited Objection that the Movant's Proposed Order not be entered, but rather the Trustee's Revised Proposed Order be entered.

Dated: March 11, 2025
Wilmington, Delaware

COZEN O'CONNOR

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